

**UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

	:	Bankruptcy No. 19-13529
	:	
Richard E. Parker and	:	
Suzanne G. Lucey-Parker.	:	
Plaintiffs,	:	ADV. PRO. NO
	:	
v.	:	
	:	
OneMain Financial Group,	:	
Defendant :		

**COMPLAINT**

1. This is an action brought under the Bankruptcy Code, 11 U.S.C. §101 et seq., seeking a declaration that a lien held by defendant on plaintiff's real property is void and an order directing defendants to take all action necessary to extinguish the lien.
2. Jurisdiction is conferred on this Court by U.S.C. §1334. This proceeding is a core proceeding.
3. Plaintiffs' action for declaration relief is authorized by 28 U.S.C. §2201 and §2202.
4. Plaintiffs, Richard E. Parker and Suzanne G. Lucey-Parker, are the adult individuals who resides at 3350 Bridle Tern, Lititz, PA 17543.
5. Defendant, OneMain Financial Group, is banking institution doing business in Lancaster, PA.
6. On May 31, 2019, plaintiffs filed a petition for relief under Chapter 13 of the Bankruptcy Code.
7. Defendant holds a non-purchase money lien on Debtor's Honda Odyssey.
8. Defendant filed one Proof of Claim as to the Honda in the amount of \$17,031.28.
9. The fair market value of plaintiff's vehicle is not greater than \$3,012.00, per the attached Exhibit "A".
10. Debtors have had a revolving loan with OneMain Financial Group for over 5 years.
11. Since the actual market value of the vehicle in its current condition is \$3,012.00, the secured portion of the debt obligation should be crammed down to \$3,012.00 which represent the current valuation and market value of the collateral.

12. Accordingly, the proposed Proof of Claim should be deemed allowed as a secured claim in the amount of \$3,012.00 and an unsecured for the balance.

claim pursuant to 11 U.S.C. §502.

**RELIEF**

WHEREFORE, plaintiff requests that this Court grant the following relief: (1) declare that the defendant's secured lien and claim on the vehicle is \$3,012.00 and (2) that the balance of the said claim is unsecured.

DATE: October 7, 2020

/s/ Alaine V. Grbach  
Alaine V. Grbach, Esquire  
Attorney for Debtor  
Attorney I.D. 45485  
675 Estelle Drive

Lancaster, PA 17601  
(717) 898-8402